

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Laverne M. Hay
Debtor

: Chapter 13
: 21-11492

**CONSENT ORDER TO SELL PROPERTY KNOWN AS
1866 SASSAFRAS LANE, QUAKERTOWN, PA 18951**

AND NOW, in consideration of the mutual promises and agreements set forth below, and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, it is hereby stipulated and agreed to by and between the undersigned as follows:

ORDERED, that Laverne M. Hay, debtor, is authorized to sell her real property located at 1866 Sassafras Lane, Quakertown, PA 18951 ("Property"), for the sale price of \$635,000.00, pursuant to the terms of a certain real estate agreement of sale dated as of July 26, 2024, to the buyer there under, Richard K. Klump and Janene A. Klump ("Buyers"), who have been represented to be purchasing the Property at arms-length.

The proceeds of the sale, including any funds held as a deposit made by or on behalf of the Buyer, shall be distributed substantially in the following manner:

1. Ordinary and reasonable settlement costs, including, but not limited to those related to notary services, deed preparation, disbursements, express shipping, surveys, municipal certifications, or any other such routine matters \$625.00
2. Liens paid at closing - Any mortgage claims existing on the subject premises. With respect to mortgage claims, said liens will be paid in full subject to a proper payoff quote at the time of closing, and closing is required within 30 days of the payoff quote date or a new payoff is required within 30 days of closing. Unless otherwise agreed by parties, the closing shall occur within 90 days of approval of this Consent Order.

\$501,076.05
(U.S. Bank NA et al c/o Select Portfolio Servicing, Inc Estimated)

3. Real estate taxes, sewer, trash and/or other such items \$10,112.61
4. Property repairs to: "Curbio" \$10,258.27
5. Real estate commission, at no greater than 6% \$38,100.00
6. Attorneys' fees to be paid to John L. McClain & Associates to be held in counsel's trust account pending further application and court approval \$5,000.00
7. Home Warranty \$709.77

8. Any small (less than \$300) allowances agreed to be made to Buyer to settle any unforeseen dispute arising at settlement	\$0.00 <u>(Estimated)</u>
9. Balance of proceeds to Laverne M. Hay, Seller/Debtor	\$69,118.30 <u>(Estimated)</u>
TOTAL	<u>\$635,000.00</u>

The title clerk shall fax (215-627-6299) and e-mail (settlementsheet@ph13trustee.com) a completed ALTA or settlement sheet from the closing directly to the trustee immediately upon close of the settlement, and the trustee shall promptly notify the title company of his approval or objections to the sums to be disbursed. Upon trustee approval, the title clerk shall email a copy of the disbursement check to the trustee at settlementsheet@ph13trustee.com and shall immediately transmit the actual disbursement check to the trustee by overnight courier to Kenneth E. West, Trustee, 1234 Market Street, Suite 1813, Philadelphia, PA 19107.

Laverne M. Hay is authorized to sign all deeds and other documents needed to transfer good title to the Real Property to the Buyers.

The Standing Chapter 13 Trustee, Kenneth West, is authorized to adjust the percentage to unsecured creditors to 100% based on funds received in accordance with 11 USC §1329

Any creditor whose claim is paid at closing shall either withdraw or amend its proof of claim in Debtor's Chapter 13 Bankruptcy upon receipt of the sale proceeds, if necessary for the administration of the Chapter 13 estate.

Debtor shall file amended schedules, a fee application (if applicable) and/or an amended plan to conform with the provisions of the sale.

This Order shall be effective immediately and shall not be subject to the Stay otherwise imposed by Bankruptcy Rule 6004 (h).

Dated: 9/19/24

/s/Michelle L. McGowen

Michelle L. McGowen, Esquire
Robertson, Anschutz, Schneid,
Crane & Partners, PLLC Attorney
for U.S. Bank Trust Company,
National Association, as Trustee,
as successor-in-interest to U.S.
Bank National Association, as
trustee, on behalf of the registered
holders of Bear Stearns
Asset Backed Securities I Trust
2006-HE8, Asset-Backed
Certificates, Series 2006-HE8
c/o Select Portfolio Servicing, Inc.

Dated: 9/19/24

/s/ Mitchell J. Prince, Esquire
Mitchell J. Prince, Esquire 61336
Attorney for Debtor

Dated: 9/20/24

Kenneth E. West
Kenneth E. West, Trustee

Dated: 9/19/24

Laverne M. Hay
Laverne M Hay
Debtor

AND NOW, this 23rd day of September 2024, it is hereby
ORDERED that the foregoing Stipulation is approved, shall be, and is made an Order of this
Court.

BY THE COURT

Patricia M. Mayer
HONORABLE PATRICIA M. MAYER
BANKRUPTCY JUDGE